

EXHIBIT B

LISA BARBOUNIS, : CIVIL ACTION
Plaintiff, :
 :
vs. :
 :
MIDDLE EAST FORUM, et al., :
Defendants. : NO. 2:19-cv-05030-GAM

Tuesday, November 17, 2020

Videotaped deposition of DANIEL PIPES,
taken pursuant to Notice and remotely via Zoom at
1650 Market Street, Philadelphia, Pennsylvania,
commencing at 10:08 a.m., and reported
stenographically by Grace M. Baldino, Professional
Shorthand Reporter and Notary Public in and for the
Commonwealth of Pennsylvania.

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1 BY MR. CARSON:

2 Q. I know. It's my fault. I get it. It's
3 not your fault in any way, correct?

4 A. They signed documents saying they were
5 content with it. Nobody complained after that
6 point, after they signed the documents.

7 Q. So you don't feel responsible for anything
8 at all?

9 MR. CAVALIER: Object to form.

10 - - -

11 (Indistinguishable cross-talk.)

12 - - -

13 THE WITNESS: I investigated and I
14 mitigated the problem to everyone's
15 satisfaction. All four individuals directly
16 involved were content with my resolution of it.
17 I thought everything was fine. They indicated
18 everything was fine. I refer you to the
19 photographs of May 19th, 2019 at our gala in
20 New York -- big smiles in a chorus line with
21 Gregg and others. Everything was fine, and
22 then all of a sudden we got big problems. Why?
23 Well, Derek Smith Law Group entered the scene.

24 BY MR. CARSON:

- - -

1 Q. Is the Middle East Forum a victim in this
2 case?

3 A. Of course it is. Of course it is. \$31
4 million for what, for made up stuff? Tricia McNulty
5 tells me that he sat too close to her, and then the
6 complaint comes in. Oh, he tried to touch her
7 bottom. Oh, really? Somehow it magically changed
8 between November and June. Wonder how that
9 happened. Sex trafficking? Oh, where did that come
10 from? Sexual assault? Where did all these things
11 come from? Who came up with sex trafficking?
12 Mr. Carson, who came up with sex trafficking?

13 Q. The United States Congress, Mr. Pipes.

14 A. United States Congress did not apply to
15 Gregg Roman; Seth Carson did.

16 Q. Have you ever read the statute because --

17 A. I've read what you have produced and what
18 words you put into their mouths.

19 Q. Have you ever read the sex trafficking
20 statute --

21 - - -

22 (Indistinguishable cross-talk.)

23 - - -

24 THE WITNESS: I do not need to know about

- - -

1 the details of sex trafficking laws. I need to
2 know that that's what you claimed.

3 BY MR. CARSON:

4 Q. So you don't know whether it applies to
5 this situation or not, do you?

6 A. I know perfectly well that you make things
7 up as you need to claim your \$31 million, of which
8 you get, what, 40 percent? How much does that come
9 to, Mr. Carson? That seems to come to about \$14
10 million for you. That's a nice payday.

11 Q. That's what you think --

12 A. Good luck with that, Mr. Carson. I'll let
13 you know that we're not gonna be paying you. We're
14 gonna fight you tooth and nail, as you can see.

15 Q. Right. And then --

16 A. Good luck with your \$14 million.

17 Q. If there's a judgment, you'll end up
18 paying it, correct?

19 A. And so far, let me point out, Mr. Carson,
20 you have paid us, not we have paid you. Due to your
21 mistakes, you have paid us, and, indeed, just a few
22 minutes ago, you got another problem with Judge
23 Wolson, didn't you?

24 Q. How much money have you received from our

- - -

1 firm?

2 A. Something on the order of \$5,000.

3 Q. And that was profit for you guys?

4 A. No.

5 MR. CAVALIER: Object to form.

6 THE WITNESS: It was the money that we had
7 to pay our lawyers because of your -- your
8 actions.

9 BY MR. CARSON:

10 Q. So how much money have you made from our
11 firm?

12 MR. CAVALIER: Object to form.

13 THE WITNESS: -- \$5,000.

14 BY MR. CARSON:

15 Q. You've made \$5,000?

16 A. We didn't make it. We paid it to our
17 lawyers because they had to spend time dealing with
18 the things you raised wrongly.

19 Q. When did you pay it to your lawyer?

20 MR. CAVALIER: Object to form. Hold up,
21 hold up. Do not answer any questions about
22 bills or payments or --

23 MR. CARSON: He raised the issue, Jon, not
24 me.

- - -

MR. CAVALIER: The instruction stands.

THE WITNESS: So far, you have paid us.

We have not paid you. I remind you of that.

And you have more problems on your docket,

don't you? Daily reports to the judge.

Remember those, Mr. Carson.

BY MR. CARSON:

Q. I'm gonna direct you back to the question that we were discussing a moment ago in connection with the sex trafficking statute. Have you ever reviewed that statute before?

A. I deal with the Middle East, Mr. Carson. I don't read sex trafficking statutes, but I know what the term means, and I know that Gregg did not engage in sex trafficking.

Q. Well, if you lure someone across national borders in order to try to engage them in sexual intercourse, isn't that what the statute states?

A. Only a perverted mind like your own would come up with an interpretation like that. He went there to work. He asked Matt Bennett first, he asked Marnie Meyer second, and he asked Lisa Barbounis third.

Q. Why didn't Marnie Meyer wanna go?